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TIJUANA, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 | RUDI JIMENEZ,

Plaintiff,

13 || vs.

14 TIJUANA, LLC, d/b/a ADVANCE MEDICAL
15 STAFFING, d/b/a RAPID TEMPS, INC., a
domestic limited liability company; DOES I-X;
16 and ROE BUSINESS ENTITIES I-X,
inclusive.

17 Defendants.

Case No.: 2:20-cv-00765-RFB-VCF

**STIPULATION TO EXTEND TIME FOR
DEFENDANT TO FILE ITS REPLY IN
SUPPORT OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

(First Request)

19 IT IS HEREBY STIPULATED by and between Plaintiff RUDI JIMENEZ (“Plaintiff”),
20 through his counsel, MAIER GUTIERREZ & ASSOCIATES, and Defendant, RAPID TEMPS,
21 INC. d/b/a/ TIJUANA, LLC (“Defendant”), by and through its counsel, Jackson Lewis P.C.,
22 hereby stipulate and agree to extend the time for Defendant to file its reply in support of motion to
23 dismiss the Plaintiff’s Complaint, which is currently due on July 8, 2020, until July 15, 2020.

24 1. The parties believe these extensions are appropriate because Counsel for
25 Defendant's drill schedule with the Army National Guard was adjusted unexpectedly due to the
26 COVID-19 pandemic, and accordingly Defendant needs a brief extension for its reply.

27 2. This stipulation and order are sought in good faith and not for the purpose of delay.

1 3. This is the first request for an extension for Defendant to file its reply in support of
2 Motion to Dismiss.

3 4. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
4 as waiving any claim and/or defense held by any party.

5 Dated this 8th day of July, 2020

6 MAIER GUTIERREZ & ASSOCIATES

7 JACKSON LEWIS P.C.

8 _____
9 /s/ *Joseph N. Mott*
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11 Joseph Nathan Mott
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20 Attorneys for Plaintiff Rudi Jimenez

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22 /s/ *Lynne K. McChrystal*
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32 Attorneys for Defendant

33 **ORDER**

34 IT IS SO ORDERED.

35 
36 _____
37 RICHARD F. BOULWARE, II
38 UNITED STATES DISTRICT JUDGE

39 DATED this 13th day of July, 2020.

40 4851-8032-3266, v. 1